

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA

IN RE:

SIMPLY ESSENTIALS, LLC

Debtor.

Bankruptcy Case No. 20-00305

Chapter 7

SUPPLEMENT TO
OBJECTION TO TRUSTEE'S MOTION
TO SELL

COMES NOW Wincorp International, Inc. ("Wincorp") for itself and on behalf of International Poultry Breeders, L.L.C. ("IPB"), a Delaware limited liability company intending to do business as The Best Dressed Chicken and herein supplements its Objection To Trustee's Motion To Sell filed July 8, 2021 (the "Objection"), as follows:

A. The Trustee's Motion To Sell was filed on June 21, 2021 (the "Motion").

B. All words capitalized herein and not defined shall have the meanings given those words in the Motion.

C. It has been determined that IPB will be the entity that purchases the Assets if it is the highest bidder and, as required by the Trustee, Wincorp will cause IPB to have all funds necessary to consummate the purchase. If successful in its bid, IPB intends to do business in Iowa as The Best Dressed Chicken.

In all other respects, Wincorp restates and reaffirms its Objection to the Motion.

BRICK GENTRY, P.C.

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INTERNATIONAL, INC., for itself and on
behalf of International Poultry Breeders,
L.L.C. intending to do business as THE
BEST DRESSED CHICKEN

CERTIFICATION OF SERVICE

The undersigned, Thomas L. Flynn, certifies that on July 8, 2021, he served a copy of the foregoing document on the United States Trustee, Debtor, the attorney for Debtor and other parties having requested notice pursuant to Rule 2002 electronically on all parties who receive electronic notice through CM/ECF as listed on CM/ECF's notice of electronic filing, and by ordinary United States mail, postage prepaid, addressed as follows on all other parties:

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